

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

v.

15-CR-28-LJV

DANIEL HUZINEC,

Defendant.

**GOVERNMENT'S MOTION TO SUBMIT
ADDITIONAL IMPACT STATEMENT UNDER SEAL**

THE UNITED STATES OF AMERICA, by and through its attorneys, James P. Kennedy, Jr., United States Attorney for the Western District of New York, and Stephanie Lamarque, Assistant United States Attorney, of counsel, hereby moves the Court to permit the filing of an additional impact statement under seal. The defendant objects to the relief sought herein.

On March 24, 2017, the government filed a Motion for Protective Order and Order permitting the filing of victim impact statements under seal. (Dkt. # 72). This Motion was granted by text order on or about April 3, 2017 (Dkt. # 74). On February 14, 2018, the government received an impact statement of a victim proximately harmed by the defendant's relevant conduct in this matter. The government requests that the Court permit the late filing under seal of the letter as an additional impact statement. Title 18, United States Code, Section 3509(d) authorizes the filing under seal the name or any other information concerning a child.

DATED: Buffalo, New York, February 14, 2018.

JAMES P. KENNEDY, JR.
United States Attorney

BY: /s/
STEPHANIE LAMARQUE
Assistant United States Attorney
United States Attorney's Office
138 Delaware Avenue
Buffalo, New York 14202
(716) 843-5894
Stephanie.Lamarque@usdoj.gov